

## 1 UNITED STATES DISTRICT COURT

## 2 NORTHERN DISTRICT OF CALIFORNIA

3  
4 IN RE: SOCIAL MEDIA ADOLESCENT  
5 ADDICTION/PERSONAL INJURY  
6 PRODUCTS LIABILITY LITIGATION

7 Case No. 4:22-md-03047-YGR

8 MDL No. 3047

9  
10 This Document Relates to:11 Lumberton Township Board of Education; Plaintiff  
12 v.  
13 Meta Platforms, Inc., et al.; Defendants14  
15 **LOCAL GOVERNMENT AND SCHOOL  
DISTRICT MASTER SHORT-FORM  
COMPLAINT AND DEMAND FOR JURY  
TRIAL**

16 Member Case No.:

17 3:25-cv-01927

18  
19 The Plaintiff(s) named below file(s) this *Short-Form Complaint and Demand for Jury Trial*  
20 against the Defendant(s) named below by and through their undersigned counsel. Plaintiff(s)  
21 incorporate(s) by reference the allegations, claims, and relief sought in *Plaintiffs' Master Local*  
22 *Government and School District Complaint* ("Master Complaint") as it relates to the named  
23 Defendant(s) (checked-off below), filed in *In Re: Social Media Adolescent Addiction/Personal*  
24 *Injury Products Liability Litigation*, MDL No. 3047, in the United States District Court for the  
25 Northern District of California. Plaintiff(s) file(s) this *Short-Form Complaint* as permitted by Case  
26 Management Order No 8.27 Plaintiff(s) indicate(s) by checking the relevant boxes below the Parties and Causes of  
28 Actions specific to Plaintiff(s)' case.

1 Plaintiff(s), by and through their undersigned counsel, allege(s) as follows:

2 **I. DESIGNATED FORUM**

3 1. *For Direct Filed Cases:* Identify the Federal District Court in which the Plaintiff(s)  
would have filed in the absence of direct filing:

4 District of New Jersey

5

6

7 2. *For Transferred Cases:* Identify the Federal District Court in which the Plaintiff(s) originally filed and the date of filing:

8

9 N/A

10

11

12 **II. IDENTIFICATION OF PARTIES**

13 **A. PLAINTIFF(S)**

14 3. *Plaintiff(s):* Name(s) of the local government or school district alleging claims  
against Defendant(s):

15 Lumberton Township Board of Education

16

17 4. Number of schools served in the Plaintiff(s)' school district or local  
18 community:

19 3

20

21 5. Number of minors served in the Plaintiff(s)' school district or local  
22 community:

23 1,193

24 6. At the time of the filing of this *Short-Form Complaint*, Plaintiff(s) is/are a resident  
and citizen of [Indicate State]:

25 New Jersey

**B. DEFENDANT(S)**

1 7. Plaintiff(s) name(s) the following Defendant(s) in this action [*Check all that apply*]:

**META ENTITIES**

- META PLATFORMS, INC.,  
*formerly known as Facebook, Inc.*
- INSTAGRAM, LLC
- FACEBOOK PAYMENTS, INC.
- SICULUS, INC.
- FACEBOOK OPERATIONS, LLC
- FACEBOOK HOLDINGS, LLC
- META PAYMENTS INC.

**TIKTOK ENTITIES**

- BYTEDANCE LTD
- BYTEDANCE INC.
- TIKTOK LTD
- TIKTOK LLC
- TIKTOK INC.

**SNAP ENTITY**

- SNAP, INC.

**GOOGLE ENTITIES**

- GOOGLE, LLC
- YOUTUBE, LLC

**OTHER DEFENDANTS**

15 For each “Other Defendant” Plaintiff(s) contends are additional parties and are liable  
 16 or responsible for Plaintiff(s)’ damages alleged herein, Plaintiff(s) must identify by  
 17 name each Defendant and its citizenship, and Plaintiff(s) must plead the specific facts  
 18 supporting any claim against each “Other Defendant” in a manner complying with the  
 requirements of the Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may  
 attach additional pages to this *Short-Form Complaint*.

NAME	CITIZENSHIP
FACEBOOK TECHNOLOGIES, LLC	USA
ALPHABET INC.	USA

1                   **III. CAUSES OF ACTION ASSERTED**

2                   8. The following Causes of Action asserted in the *Master Complaint*, and the allegations  
 3                   with regard thereto, are adopted in this *Short-Form Complaint* by reference (*check all*  
 4                   *that are adopted*):

4 <b>Asserted Against<sup>1</sup></b>	5 <b>Count Number</b>	6 <b>Cause of Action (COA)</b>
7 <input checked="" type="checkbox"/> Meta entities <input checked="" type="checkbox"/> Snap <input checked="" type="checkbox"/> TikTok entities <input checked="" type="checkbox"/> Google entities <input checked="" type="checkbox"/> Other Defendant(s) <sup>2</sup>	8                   1	9                   NEGLIGENCE
10 <input checked="" type="checkbox"/> Meta entities <input checked="" type="checkbox"/> Snap <input checked="" type="checkbox"/> TikTok entities <input checked="" type="checkbox"/> Google entities <input checked="" type="checkbox"/> Other Defendant(s)	11                   2	12                   PUBLIC NUISANCE

13                   **NOTE**

14                   If Plaintiff(s) want(s) to allege additional Cause(s) of Action other than those selected in paragraph  
 15                   8, which are the Causes(s) of Action set forth in the *Master Complaint*, the facts supporting those  
 16                   additional Cause(s) of Action, must be pled in a manner complying with the requirements of the  
 17                   Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may attach additional pages to this  
 18                   *Short-Form Complaint*.

19                   **IV. ADDITIONAL CAUSES OF ACTION**

20                   9. Plaintiff(s) assert(s) the following additional Causes of Action and supporting  
 21                   allegations against the following Defendants:

22  
 23  
 24  
 25  
 26                   <sup>1</sup> For purposes of this paragraph, “entity” means those Defendants identified in Paragraph 7 (e.g.,  
 27                   “TikTok entities” means all TikTok Defendants against which Plaintiff(s) is/are asserting claims).

28                   <sup>2</sup> Reference selected “Other Defendants” by the corresponding row number in the “Other  
 29                   Defendant(s)” chart identified in Paragraph 7.

1                   **WHEREFORE**, Plaintiff(s) pray(s) for relief and judgment against Defendants and all  
2 such further relief that this Court deems equitable and just as set forth in the *Master Complaint*,  
3 and any additional relief to which Plaintiff(s) may be entitled.  
4

5                   **JURY DEMAND**

6 Plaintiff(s) hereby demand a trial by jury as to all claims in this action.

7                   \*\*\*\*\*

8 By signature below, Plaintiff(s)' counsel hereby confirms their submission to the authority  
9 and jurisdiction of the United States District Court of the Northern District of California and  
10 oversight of counsel's duties under Federal Rule of Civil Procedure 11, including enforcement as  
11 necessary through sanctions and/or revocation of *pro hac vice* status.

12                   /s/ William B. Shinoff

13                   Name: William B. Shinoff, Esq.

14                   Firm: Frantz Law Group, APLC

15                   Address: 2029 Century Park East # 400, Los Angeles, CA 90067

16                   Phone: (323) 425-8138

17                   Fax: (619) 525-7672

18                   Email: wshinoff@frantzlawgroup.com

20                   *Attorneys for Plaintiff(s)*

21                   Lumberton Township Board of Education